

Henry Walker (615) 252-2363 Fax: (615) 252-6363

June 13, 2002

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 360 James Robertson Parkway Nashville, TN 37201

> Re: Complaint of AENEAS Communications Against Citizens Communications in Weakley County, Tennessee

Docket No. 02-00438

Dear David:

Enclosed herewith are the original and thirteen copies of a petition to intervene filed on behalf of the Southeastern Competitive Carriers Association ("SECCA") in the abovecaptioned proceeding. A check in the amount of \$25.00 is also enclosed.

Thank you for your attention to this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Henry Walker

HW/nl Enclosure c: parties

CAR 2500

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

June 14, 2002

IN RE: Complaint of AENEAS Communications)	
Against Citizens Communications in Weakley)	Docket No. 02-00438
County, Tennessee.)	
)	

PETITION TO INTERVENE

The Southeastern Competitive Carriers Association ("SECCA") petitions the Tennessee Regulatory Authority ("TRA") to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(b).

The above-captioned docket concerns a complaint initiated by Aeneas Communications ("Aeneas") against Citizens Communications ("Citizens") in Weakley County, Tennessee on January 29, 2002, whereby Citizens refuses to route county-wide calls to the tandem switch of BellSouth. Citizens insists they should be able to send the calls over EAS trunks directly to the BellSouth end office. The BellSouth end office is not equipped to identify CLEC bound traffic and the calls are being dropped. Because the Consumer Services Division of the Tennessee Regulatory Authority ("TRA") was unable to resolve this complaint pursuant to Tenn. Code Ann. δ 65-4-119, the TRA opened a contested case proceeding and appointed a hearing officer to hear the matter on the merits.

SECCA is an association composed of competitive telecommunications carriers, including local exchange carriers, many of whom operate or intend to operate in both rural and non-rural areas of Tennessee. The legal rights, duties, privileges, immunities, or other legal interests of SECCA members may be affected or determined by the outcome of this proceeding.

Granting this petition will not impair the orderly and prompt conduct of this proceeding SECCA therefore requests that this Petition to Intervene be granted.

Respectfully submitted,

Henry Walker

Boult, Cummings, Conners & Berry, PLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 14th day of June, 2002.

Jim Wright, Esq. United Telephone-Southeast, Inc. 14111 Capital Boulevard Wake Forest, NC 27587

Aeneas Communications, LLC Jonathon Harlan 301 South Church St. Jackson, TN 38031

Henry Walker